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6/23/14



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

JUN 23 2014

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-127

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Return Receipt Requested

J. Wayne Maxie, R.G.
Manager, Environmental Projects
Agrium US, Inc.
4582 S Ulster Street Suite 1700
Denver, CO 80237-2641

Re: 2014 Groundwater Investigation Work Plan
Administrative Order on Consent for Nu-West Industries, Inc.
Idaho Facility, Docket No. RCRA-10-2009-0186

FILE COPY

Dear Mr. Maxie:

EPA has reviewed the 2014 Groundwater Investigation Work Plan (Work Plan), submitted by WSP on behalf of Nu-West Industries Inc. (Nu-West) on June 13, 2014. The Work Plan is approved.

EPA has identified a few typos within the Work Plan. We point these out and are clarifying two other matters so to avoid any misunderstanding moving forward with work. This was discussed on a conference call with Eric Syrstad (Agrium), Jim Bulman (WSP), and Bernie Zavala (EPA) earlier today. Submittal of a revised report is not necessary.

Comments

Page 3, second to last line of text in the Work Plan states the following:

Figures 1 and 2 show the locations for 12 proposed bedrock monitoring wells (A-66 through A-72).

Figure 1 represents that locations A-66 through A-69 are, "Proposed Basalt Aquifer Monitoring Well."
Figure 2 represents that locations A-66 through A-72 are, "Proposed Basalt Bedrock Monitoring Well."

EPA's understanding is that these represent the same thing.

Page 10, second paragraph in the Work Plan states the following:

IDW will be managed in accordance with the procedures specified in the Updated Supplemental Work Plan, Revision 2 (Section 5.6).

Section 5.7 specifies the procedures for management of IDW.

Table 1 in the Work Plan identifies that for well location A-75, the targeted screen interval is in the Middle Basalt Aquifer, and that for well locations A-76 and A-77, the targeted screen intervals are in the Lower Basalt Aquifer. The table states that static water levels in MW05-3-240 and MW05-4-260 have indicated past saturation levels within the middle and lower basalt aquifers respectively.

MW05-3-240 and MW05-4-260 each have 100' screen intervals. The static water level in each well is likely affected by connection of the different flow zones. EPA's understanding is that the screen interval for each of the monitoring wells A-75 through A-77 is to be at the uppermost saturated basalt aquifer, identified through drilling observations and the other factors stated on page 6 of the Work Plan.

EPA understands that the installation of monitoring wells at locations A-63, A-64, and A-65 will be done in that sequence, as indicated in the schedule shown on Figure 3. Per our conference call earlier today, we discussed the rationale for the A-65 location. We agreed that pending the drilling observations at the A-63 and A-64 locations, we would discuss whether or not adjustment of the A-65 location would be appropriate prior to advancement of a borehole at the A-65 location.

Thank you for your attention to this important matter.

Sincerely,



Peter Magolske
Air and RCRA Compliance Unit

cc: Brian Monson, Idaho Department of Environmental Quality
P. Scott Burton, Esq. Hunton and Williams LLP
Timothy J. Carlstedt, Esq. Hunton and Williams LLP

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Manager, Environmental Projects
Agrium US, Inc.
4582 S. Ulster Street, Suite 1700
Denver, CO 80237

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